

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Paul Hastings LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period from
March 1, 2024 through March 31, 2024

Total Fees:	\$27,694.00
Total Disbursements:	\$87.76
Minus 20% holdback of Fees:	(5,538.80)
Amount Sought at this Time	\$22,242.96

Total for Statement Period					
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Micheli, Matthew	Financial Restructuring	2002	\$1,885.00	5.20	\$9,802.00
Total Counsel:				5.20	\$9,802.00
Farmer, Will	Financial Restructuring	2018	\$1,390.00	0.70	\$973.00
Miliotes, Lanie	Financial Restructuring	2023	\$985.00	1.10	\$1,083.50
Simpson, Louise	Financial Restructuring	2022	\$985.00	14.70	\$14,479.50
Total Associate:				16.50	\$16,536.00
Magzamen, Michael	Financial Restructuring		\$565.00	2.40	\$1,356.00
Total Paraprofessional:				2.40	\$1,356.00
Total:				24.10	\$27,694.00

SECTION II
SUMMARY OF SERVICES

U.S. Trustee Task Code and Project Category	Total for Statement Period	
	Total Hours	Total Fees
B113 Pleadings Review	0.70	\$563.50
B160 Employment / Fee Applications (Paul Hastings)	21.90	\$25,441.50
B191 General Litigation	1.50	\$1,689.00
TOTAL	24.10	\$27,694.00

SECTION III
SUMMARY OF DISBURSEMENTS

Category	Total for Statement Period
Computer Search	\$22.86
Outside Professional Services	\$64.90
TOTAL	\$87.76

I certify under the penalty of perjury that the above is true.

Dated: August 13, 2024

/s/ Mathew M. Murphy
Mathew M. Murphy

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP
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Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting
Counsel*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,
COUNSEL TO AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE
PERIOD FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

On June 20, 2023, the Court entered the Order Authorizing the Debtor to Enter into the Reimbursement Agreement [ECF No. 838] (the “Reimbursement Order”), pursuant to which the Debtor entered into a post-petition expense reimbursement agreement (the “Reimbursement Agreement”) to pay certain fees and expenses of the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”).

The Reimbursement Agreement provides that the Debtor will pay the reasonable and documented fees and out-of-pocket expenses of professionals retained by the AHC of Supporting Counsel, including, among others, Paul Hastings LLP (“Paul Hastings”), for the period from April 18, 2023 through the termination of the Reimbursement Agreement.

The Reimbursement Agreement further provides that Paul Hastings will file monthly fee statements and interim and final fee applications in accordance with the Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [ECF No. 562] (the “Interim Compensation Order”), entered on May 22, 2023.

The Court’s *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [ECF No. 1211] (the “Dismissal Order”) provides that the “fees and expenses of professionals retained by the Ad Hoc Committee of Supporting Counsel shall remain subject to the” Reimbursement Agreement. The Dismissal Order further provides that the Interim Compensation Order “shall remain in full force and effect through and including the Appeal Exhaustion Date” for Retained Professionals, which covers professionals retained by the Ad Hoc Committee of Supporting Counsel.

Paul Hastings respectfully submits this Fee Application in accordance with the Reimbursement Order, the Reimbursement Agreement, the Interim Compensation Order and the

Dismissal Order for services rendered and expenses incurred as counsel to the Ad Hoc Committee of Supporting Counsel for the period commencing February 1, 2024 and ending February 29, 2024 (the “Statement Period”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Paul Hastings for the Statement Period are annexed hereto as Exhibit A. These invoices detail the services performed by Paul Hastings.

The payment of fees and reimbursement of expenses requested in this Statement are as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$27,694.00	\$5,538.80	\$22,155.20	\$87.76

WHEREFORE, Paul Hastings respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$22,242.96 (80% of total fees and 100% of expenses) in accordance with the Interim Compensation Order.

Dated: August 13, 2024

PAUL HASTINGS LLP

/s/ Matthew M. Murphy

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Counsel to AHC of Supporting Counsel

EXHIBIT A



PAUL HASTINGS LLP
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Ad Hoc Committee of Supporting Talc Counsel in LTL June 30, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2402682

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

SUMMARY SHEET

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

Legal fees for professional services for the period ending March 31, 2024	\$27,694.00
Costs incurred and advanced	87.76
Current Fees and Costs Due	\$27,781.76
Total Balance Due - Due Upon Receipt	\$27,781.76



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Ad Hoc Committee of Supporting Talc Counsel in LTL June 30, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2402682

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

REMITTANCE COPY

Representation in Chapter 11 bankruptcy proceedings

PH LLP Client/Matter # 51691-00002
Scott A. Heard

Legal fees for professional services for the period ending March 31, 2024	\$27,694.00
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Total Balance Due - Due Upon Receipt	\$27,781.76



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Ad Hoc Committee of Supporting Talc Counsel in LTL June 30, 2024
488 Madison Avenue
New York, NY

Please Refer to
Invoice Number: 2402682

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED
for the period ending March 31, 2024

Representation in Chapter 11 bankruptcy proceedings **\$27,694.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B113 Pleadings Review					
03/04/2024	MM57	Research re: ECF filings and update working group re: same	0.10	565.00	56.50
03/11/2024	MM57	Research re: ECF filings and update working group re: same	0.20	565.00	113.00
03/26/2024	LS27	Review interim compensation order and related filings	0.40	985.00	394.00
Subtotal: B113 Pleadings Review				0.70	563.50

B160 Fee/Employment Applications

03/01/2024	LS27	Review and revise August, September, and November invoices and fee statements	1.40	985.00	1,379.00
03/01/2024	MM53	Review invoices and monthly fee statements	1.30	1,885.00	2,450.50
03/01/2024	MM57	Draft fee statements for December 2023 and January 2024 services (.8); correspond with L. Simpson re: same (.1)	0.90	565.00	508.50

Ad Hoc Committee of Supporting Talc Counsel in LTL
 51691-00002
 Invoice No. 2402682

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/02/2024	LS27	Correspond with M. Micheli, C. Edge and Cole Schotz regarding October, November, December and January summary invoices and fee statements	1.00	985.00	985.00
03/02/2024	MM53	Review invoices and monthly fee statements	1.00	1,885.00	1,885.00
03/03/2024	LS27	Correspond with M. Micheli and L. Miliotes regarding summary fee invoices	0.30	985.00	295.50
03/04/2024	LS27	Review and revise October, December, and January invoices	1.40	985.00	1,379.00
03/05/2024	LM20	Correspond with L. Simpson re monthly fee statement issues and filing	0.40	985.00	394.00
03/05/2024	LS27	Review and revise August, September and October invoices and fee statements (.1.0); calls with Cole Schotz re same (.2); correspond with M. Micheli, M. Murphy, L. Miliotes, M. Magzamen and Cole Schotz re same (.9)	2.10	985.00	2,068.50
03/05/2024	MM53	Review fee statements for August, November and December services	0.40	1,885.00	754.00
03/05/2024	MM57	Revise fee statements for services through October (.5); correspond with L. Simpson, M. Micheli and L. Miliotes re: same (.1)	0.60	565.00	339.00
03/06/2024	LS27	Correspond with Cole Schotz regarding outstanding invoices	0.50	985.00	492.50
03/07/2024	LM20	Correspond with L. Simpson re fee statement preparation and filing	0.20	985.00	197.00
03/07/2024	LS27	Correspond with C. Edge and Cole Schotz regarding outstanding invoices	0.70	985.00	689.50
03/07/2024	MM53	Review open fee application issues	0.20	1,885.00	377.00
03/12/2024	LS27	Correspond with Cole Schotz, M. Micheli and C. Edge re outstanding invoices	0.40	985.00	394.00
03/12/2024	MM53	Review revised monthly fee statements	0.40	1,885.00	754.00
03/13/2024	LM20	Correspond with L. Simpson re invoice preparation (.3); call with B. Churbuck re same (.2)	0.50	985.00	492.50
03/13/2024	LS27	Correspond with Cole Schotz re process for submitting invoices going forward	0.60	985.00	591.00

Ad Hoc Committee of Supporting Talc Counsel in LTL
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/13/2024	LS27	Correspond with M. Micheli, Cole Schotz, L. Miliotes and C. Edge regarding submitting invoices to Jones Day and related reimbursement agreement	1.80	985.00	1,773.00
03/14/2024	LS27	Review and revise February invoice (1.0); correspond with M. Micheli, Cole Schotz, C. Edge, and Jones Day re August, September and October invoices (.8)	1.80	985.00	1,773.00
03/14/2024	MM53	Draft revisions to January monthly fee statement	0.50	1,885.00	942.50
03/14/2024	MM53	Draft revisions to February monthly fee statement	0.40	1,885.00	754.00
03/14/2024	MM53	Draft revisions to December monthly fee statement	0.50	1,885.00	942.50
03/26/2024	LS27	Correspond with M. Micheli, A. Glogowski, M. Jones re professional compensation and next steps (.3); further correspond with A. Glogowski re same (.4); correspond with M. Micheli, C. Edge and Cole Schotz regarding updating monthly invoices for August 2023 through January 2024 services (1.6)	2.30	985.00	2,265.50
03/26/2024	MM53	Analysis of monthly fee statements	0.30	1,885.00	565.50
Subtotal: B160 Fee/Employment Applications			21.90		25,441.50

B191 General Litigation

03/05/2024	WCF	Draft letter to Third Circuit regarding availability for oral argument (.2); correspond with R. Montefusco regarding same (.1)	0.30	1,390.00	417.00
03/11/2024	MM57	Correspond with W. Farmer and R. Montefusco re: Third Circuit oral argument letter (.2); review and comment re: same (.2); e-file same (.2)	0.60	565.00	339.00
03/11/2024	WCF	Revise scheduling letter before Third Circuit (.3); correspond with R. Montefusco regarding same (.1)	0.40	1,390.00	556.00

Ad Hoc Committee of Supporting Talc Counsel in LTL
51691-00002
Invoice No. 2402682

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/13/2024	MM53	Analyze appeal issues	0.20	1,885.00	377.00
Subtotal: B191 General Litigation			1.50		1,689.00

Total	24.10	27,694.00
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
MM53	Matthew Micheli	Of Counsel	5.20	1,885.00	9,802.00
WCF	Will C. Farmer	Associate	0.70	1,390.00	973.00
LM20	Lanie Miliotes	Associate	1.10	985.00	1,083.50
LS27	Louise Simpson	Associate	14.70	985.00	14,479.50
MM57	Michael Magzamen	Paralegal	2.40	565.00	1,356.00

Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
03/11/2024	Computer Search (Other)			16.20
03/28/2024	Computer Search (Other)			6.66
03/31/2024	UnitedLex Invoices - Unitedlex Corp, Invoice# 096578 Dated 03/31/24, UnitedLex – DSAI March 2024 Charges – Outside Professional Services			64.90
Total Costs incurred and advanced				\$87.76

Current Fees and Costs	\$27,781.76
Total Balance Due - Due Upon Receipt	\$27,781.76
